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PETITION BY THE UNITED STATES)
DEPARTMENT OF TRANSPORTATION)
FOR ASSIGNMENT OF AN ABBREVIATED)
DIALING CODE (N11) TO ACCESS)
INTELLIGENT TRANSPORTATION SYSTEM)
(ITS) SERVICES NATIONWIDE)

FILE NO. NSD-L-24

CC DOCKET NO. 92-105

COMMENTS OF UNITED WAY OF METROPOLITAN ATLANTA

Pursuant to the April 20, 1999, notice of the Federal Communications Commission, United Way 211, a service of United Way of Metropolitan Atlanta, hereby files these Initial Comments with respect to the "Petition by the United States Department of Transportation (DOT) for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide."

United Way of Metropolitan Atlanta (UWMA) does not oppose the DOT's petition provided the Commission does not assign the 211 dialing code to ITS services.

I. United Way 211 Description and Background

United Way of Metropolitan Atlanta created the nation's first three-digit telephone number dedicated to community life. On May 6, 1997, the Georgia Public Service Commission assigned 211 to UWMA, creating **United Way 211**. It is designed to give over 3 million citizens in 13 Georgia counties a simple, easy-to-remember number to call when they want to help or when they need access to human services.

Access to emergency police and fire services through the "911" telephone number is nearly universal and an indispensable service. Telephone directory assistance available by dialing "411" is another service we have come to depend upon. However, thousands of individuals and families search every day for emergency financial assistance, food or shelter. Looking for help means finding dozens of phone numbers and then searching through a confusing maze of agencies and services.

United Way 211 is a free 24-hour telephone information and referral service. Using a database of over 2000 agencies, referral agents match callers to social services, volunteer opportunities, and donation requests. The service also uses information collected from callers to map community services and needs.

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II. United Way of Metropolitan Atlanta Investment in 211

The metropolitan Atlanta community has invested a significant amount of money to develop and operate United Way 211. Over the past three years millions of dollars in grants, in-kind donations, volunteer hours and United Way funding have been invested in the service. The summary below describes the investment over the past two years and the projected investment for the coming fiscal year.

United Way 211 Investment Summary January 1997 – June 2000

| | Development and Implementation | Year One 7/97-6/98 | Year Two 7/98-6/97 | Year Three 7/98-6/97 |
|--|-----------------------------------|-----------------------|-----------------------|-------------------------|
| Service Expansion – Capital Budget ¹ | \$ 426,841 | | | |
| Service Expansion – Equipment Donation ² | \$ 400,000 | | | |
| 211 Agency Capacity Building Grants ³ | | \$ 117,500 | \$ 167,500 | \$ 50,000 |
| Annual Operating Budget ⁴ | | \$ 1,272,000 | \$ 1,600,000 | \$ 2,010,000 |

¹ Funded with grants from 3 foundations.

² Estimated value of equipment donated by two private donors.

³ Funded by a foundation grant and allocated to local human service providers to expand their capacity to handle referrals from 211.

⁴ A portion of the operating budget was funded during years one and two by a foundation grant, the remainder was funded by United Way of Metropolitan Atlanta.

Private corporations, public institutions and other associations have also made significant commitments to support the continued development of the service. BellSouth is one example that has a potential for regional impact. On July 1, 1999 BellSouth announced a partnership with United Way 211. BellSouth's has committed to providing financial support, advertising assistance and help improve access to 211.

UWMA strongly opposes the assignment of 211 to anything other than community information and referral because of the financial burden the change would create for United Way and the community. The assignment of 211 nationally to ITS would require United Way, its donors and the Atlanta community to bear the expense of reprogramming BellSouth systems and internal PBX systems to allow access to 511 instead of 211. Three years of public awareness building, related marketing materials, publications and the 211 website would also need to be duplicated.

III. The National 211 Movement

From its inception, the 211 concept has created tremendous public interest and support. United Way 211 now receives daily requests for information from across the country, Canada and Puerto Rico regarding starting a 211 service. Unlike other services created for the public good that must be sold to communities, the 211 concept sells itself.

United Way 211 is a founding member of the 211 Collaborative, an organization created to help communities, cities, counties and states implement 211. The 211 Collaborative filed a request with the Commission on May 28, 1998 seeking assignment of 211 for use by community I&R services. Since that time United Way 211 has assisted in developing and providing comprehensive training to organizations developing a 211 service. (Detailed information regarding the 211 Collaborative is provided in the Collaborative's comments to the Commission regarding the DOT's petition.)

The Georgia Alliance of Information and Referral Services, the state affiliate of the national Alliance of Information and Referral Systems, is currently developing the funding and technical support to expand 211 in Georgia. Contact Columbus, a United Way supported Information and Referral service and member of GAIRS, has petitioned the Georgia Public Service Commission for the assignment of 211 in their service area. GAIRS anticipates that statewide implementation of 211 can be completed within 18 months. GAIRS will manage the implementation of 211 to ensure that the network meets the standards recommended by AIRS, United Way of America and the 211 Collaborative.

The assignment of 211 to anything other than community information and referral will undermine current national, state and local efforts to develop 211 services.

IV. Highest and Best Possible Use

The UWMA believes that the assignment of 211 for community information and referral is the highest and best use of this number, consistent with the goal outlined in the Commission's February 19, 1997 First Report and Order in CC Docket No, 92-105. The impact of 211 in the Atlanta metropolitan area has exceeded initial expectations. In addition to the simplicity and efficiency of a three-digit phone number to access community assistance, there have been other benefits to the community.

Civic Involvement

A 211 service also connects volunteers and donors to volunteer centers, gifts-in-kind programs, community food banks, furniture banks and other service organizations. United Way 211 has developed partnerships with Hands On Atlanta and the Metropolitan Atlanta Furniture Bank to improve service to callers seeking to volunteer or donate.

Expanded Resources

The 211 database has grown to include neighborhood associations, community development corporations, grassroots organizations and other community groups. The 211 commitment to building and maintaining a community database has convinced other organizations to work with 211 rather than create new databases. America's Promise, HBO, and Mission New Hope (the local partner of the Office of National Drug Policy and Control) have chosen to use 211 in Atlanta as their phone number on television and print media. Two national retailers (names withheld) are partnering with United Way 211 to pilot programs that expand funding for emergency financial assistance.

Investments made in the 211 service benefit other organizations as well. For example, United Way 211 established a two-year **United Way 211 Transition Fund** to provide short-term support to agencies likely to receive substantial increases in referrals as a result of the development of 211. Over \$280,000 in transition fund grants have been distributed to date.

Improved information for community planning

Information and Referral services maintain databases that contain information collected from thousands of callers annually. The information collected on caller need, service availability, agency effectiveness, community resources and caller demographics is invaluable to community planners. The 211 center can also collect, consolidate and share information from service providers and I&Rs. United Way 211 has developed many specialized service directories for providers and community planners.

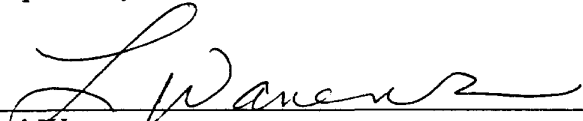
An obvious focal point for new initiatives

211 is a focal point for coordinating the work of community agencies and services. The 211 experience shows that previously competitive organizations view 211 as a shared utility that provides a neutral forum for collaborations and community problem solving.

V. Summary

The United Way of Metropolitan Atlanta does not object to the DOT's request for a n11 number. However, UWMA does object to the assignment of 211 to ITS. This assignment would create a large financial burden on UWMA and the community that supports United Way 211. The assignment would also undermine the progress that is rapidly being made toward the development of a national 211 system.

Respectfully Submitted,



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